

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

AUG 12 2008

JAMES N. HATTEN, Clerk
By:  Deputy Clerk

UNITED STATES OF AMERICA	:	CRIMINAL INDICTMENT
v.	:	
	:	
SAUL ROMERO RUGERIO,	:	NO. 1 08 - CR - 317
MIGUEL ANGEL RUGERIO, and	:	
CHRISTINA HERNANDEZ,	:	
also known as ALONDRA	:	

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning in or about the Spring of 2007, and continuing until on or about August 6, 2008, in the Northern District of Georgia and elsewhere, the defendants, SAUL ROMERO RUGERIO, MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, and other persons whose identities are known and unknown to the grand jury, did combine, conspire, confederate, agree, and have a tacit understanding to commit offenses against the United States, that is:

- (A) to knowingly transport "K.V.", "I.H.", "R.A." and "F.G." in interstate and foreign commerce, with the intent that "K.V.", "I.H.", "R.A." and "F.G." engage in prostitution, in violation of Title 18, United States Code, Section 2421;
- (B) to knowingly and with reckless disregard of the fact that aliens came to, entered and remained in the United States in violation of the law, harbor such aliens, including

"K.V.", "I.H.", "R.A." and "F.G.", in a place, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii);

- (C) to directly and indirectly, knowingly import, keep, maintain, control, support, employ and harbor aliens, including, "K.V.", "I.H.", "R.A." and "F.G.", in the United States for the purpose of prostitution, in violation of Title 8, United States Code, Section 1328; and
- (D) to knowingly recruit, entice, harbor, transport, provide and obtain by any means "K.V.," "I.H." and "R.A.", in and affecting interstate and foreign commerce, knowing that force, fraud and coercion would be used to cause those females to engage in commercial sex acts, in violation of Title 18, United States Code, Section 1591.

MANNER AND MEANS OF THE CONSPIRACY

1. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO and MIGUEL ANGEL RUGERIO, aided and abetted by CHRISTINA HERNANDEZ, also known as ALONDRA, and other persons whose identities are known and unknown to the grand jury, smuggled victims into the United States from Mexico for the purpose of prostitution.

2. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO and MIGUEL ANGEL RUGERIO concealed from the victims they

smuggled into the United States, the defendants' intent to force the victims to engage in prostitution once they arrived in the United States.

3. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO, MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, and other persons whose identities are known and unknown to the grand jury, compelled the victims to engage in prostitution, once they arrived in the United States, to repay smuggling debts and other expenses.

4. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO, MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, and other persons whose identities are known and unknown to the grand jury, harbored the victims, once they arrived in the United States, in multiple apartments where the victims would not be discovered by law enforcement.

5. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO, MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, and other persons whose identities are known and unknown to the grand jury, used violence, sexual assaults, threats of violence, threats of violence to family members, and threats of deportation and imprisonment, to compel the victims to engage in prostitution.

6. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO, MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known

as ALONDRA, and other persons whose identities are known and unknown to the grand jury, hired drivers to transport victims to various locations in the Atlanta, Georgia, area, for the purpose of prostitution, once they arrived in the United States, to avoid detection by law enforcement.

7. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO, MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, purchased risque clothing for the victims, once they arrived in the United States, for the purpose of prostitution.

8. As a part of the conspiracy, Defendants SAUL ROMERO RUGERIO, MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, collected cash payments earned by the victims through prostitution.

OVERT ACTS

1. In or about the Spring of 2007, in Mexico, Defendant SAUL ROMERO RUGERIO met and began to romantically pursue "K.V.", then age 17 years and a secondary school student in Mexico.

2. In or about the Spring of 2007, and after dating "K.V." for approximately two months, SAUL ROMERO RUGERIO persuaded and convinced "K.V." to travel with him from Mexico to the United States, by falsely promising to bring "K.V." to the United States to be with him romantically, and to provide a better life for her.

3. In or about August 2007, Defendant SAUL ROMERO RUGERIO arranged with smugglers, called "coyotes", to smuggle "K.V." and himself into the United States from Mexico.

4. In or about August 2007, Defendant SAUL ROMERO RUGERIO unlawfully entered the United States from Mexico with "K.V.", traveling in interstate and foreign commerce.

5. In or about August 2007, and upon the arrival of Defendant SAUL ROMERO RUGERIO and "K.V." in the United States, Defendants SAUL ROMERO RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, told "K.V." that she would be required to work as a prostitute to repay smuggling and other expenses to Defendants SAUL ROMERO RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA.

6. In or about August 2007, Defendant SAUL ROMERO RUGERIO, aided and abetted by CHRISTINA HERNANDEZ, also known as ALONDRA, caused "K.V." to engage in multiple acts of prostitution at various locations in the Atlanta, Georgia, area.

7. From in or about August 2007, until in or about November 2007, Defendants SAUL ROMERO RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, kept the cash proceeds from the acts of prostitution they caused "K.V." to do.

8. Some time between in or about August 2007, and November 2007, Defendant SAUL ROMERO RUGERIO physically assaulted "K.V." when she asked for money to send to her family in Mexico.

9. Some time between in or about August 2007, and November 2007, Defendant SAUL ROMERO RUGERIO told "K.V." that he would cause immigration officials to arrest and jail her.

10. From in or about August 2007, until in or about November 2007, Defendants SAUL ROMERO RUGERIO, MIGUEL ANGEL ROMERO and CHRISTINA HERNANDEZ, also known as ALONDRA, housed "K.V." at the location of 1286 Southern Woods Drive, Apartment G, in Tucker, Georgia.

11. From in or about August 2007, until in or about November 2007, Defendant SAUL ROMERO RUGERIO, aided and abetted by Defendants MIGUEL ANGEL ROMERO and CHRISTINA HERNANDEZ, also known as ALONDRA, kept "K.V." from leaving the apartment alone.

12. From in or about August 2007, until in or about November 2007, Defendant SAUL ROMERO RUGERIO repeatedly forced "K.V." to have sex with him while "K.V." was housed at the location of 1286 Southern Woods Drive, Apartment G, in Tucker, Georgia.

13. During in or about November 2007, after "K.V." escaped the defendants, Defendant MIGUEL ANGEL ROMERO attempted to locate "K.V." by contacting her family in Mexico.

14. In or about August 2007, in Mexico, Defendant MIGUEL ANGEL RUGERIO met and began to romantically pursue "I.H.", then age 17 years, in Mexico.

15. In or about September 2007, Defendant MIGUEL ANGEL RUGERIO told "I.H." that she would be traveling with him from Mexico to Atlanta, Georgia, to find work.

16. In or about September 2007, Defendant MIGUEL ANGEL RUGERIO arranged with smugglers, called "coyotes", to smuggle "I.H." into the United States from Mexico.

17. In or about September 2007, Defendant MIGUEL ANGEL RUGERIO caused "I.H." to unlawfully enter the United States from Mexico, traveling in interstate and foreign commerce.

18. In or about September 2007, Defendant CHRISTINA HERNANDEZ, also known as ALONDRA, aided and abetted by other persons whose identities are known to the grand jury, transported "I.H.", who had just been delivered to the area by coyotes, from an unknown location in Atlanta, Georgia, to the location of 1286 Southern Woods Drive, Apartment G, in Tucker, Georgia.

19. Between in or about September 2007, and November 2007, Defendants MIGUEL ROMERO RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, housed "I.H." at the location of 1286 Southern Woods Drive, Apartment G, in Tucker, Georgia.

20. In or about September 2007, and upon the arrival of "I.H." in Tucker, Georgia, Defendant CHRISTINA HERNANDEZ, also known as ALONDRA, told "I.H." that she must engage in prostitution to repay smuggling fees and other expenses to Defendants MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA.

21. In or about September 2007, and after "I.H." refused to engage in prostitution, Defendant CHRISTINA HERNANDEZ, also known as ALONDRA, threatened to telephone Defendant MIGUEL ANGEL HERNANDEZ to inform him that "I.H." refused to engage in prostitution.

22. In or about September 2007, Defendants MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, caused "I.H." to engage in multiple acts of prostitution at various locations in the Atlanta, Georgia, area.

23. From in or about September 2007, until November 2007, Defendants MIGUEL ANGEL RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, kept the cash proceeds from the acts of prostitution that "I.H." was forced to do.

24. In or about December 2007, DEFENDANT SAUL ROMERO met "R.A.", a young Costa-Rican female, in Mexico.

25. In or about December 2007, Defendant SAUL ROMERO RUGERIO told "R.A." that he could help her travel from Mexico to the United States and find work in Atlanta, Georgia.

26. In or about December 2007, and prior to leaving Mexico, Defendant SAUL ROMERO RUGERIO housed "R.A." at his home in Mexico, where he kept her locked in a bedroom.

27. In or about December 2007, in Mexico, Defendant SAUL ROMERO RUGERIO physically and sexually assaulted "R.A." on multiple occasions, and refused to allow "R.A." to leave his home.

28. Between in or about December 2007, and in or about March 2008, Defendant SAUL ROMERO RUGERIO transported "R.A." in interstate and foreign commerce, from Mexico into the United States, and then to the Atlanta, Georgia, area.

29. Between in or about December 2007, and in or about March 2008, Defendant SAUL ROMERO RUGERIO, aided and abetted by CHRISTINA HERNANDEZ, also known as ALONDRA, housed "R.A." at the location of 6168 S. Norcross-Tucker Road, Apartment 1808, in Atlanta, Georgia.

30. During in or about March 2008, Defendant SAUL ROMERO RUGERIO, aided and abetted by CHRISTINA HERNANDEZ, also known as ALONDRA, caused "R.A." to engage in multiple acts of prostitution in the Atlanta, Georgia, area.

31. During in or about March 2008, Defendant SAUL ROMERO RUGERIO physically and sexually assaulted "R.A.", threatened her with violence, threatened to harm her family members, and threatened to arrange for her to be deported.

32. During in or about March 2008, Defendant CHRISTINA HERNANDEZ, also known as ALONDRA, threatened to call immigration officers about "R.A." so that she would be jailed.

33. Defendants SAUL ROMERO RUGERIO and CHRISTINA HERNANDEZ, also known as ALONDRA, kept the cash proceeds from the acts of prostitution they forced "R.A." to do.

34. In or about August 2007, Defendant MIGUEL ANGEL RUGERIO arranged with smugglers, called "coyotes", to smuggle "F.G." and him into the United States from Mexico.

35. In or about August 2007, Defendant MIGUEL ANGEL RUGERIO caused "F.G." to unlawfully enter the United States from Mexico, traveling in interstate and foreign commerce.

36. Between in or about March 2008, and continuing through on or about August 6, 2008, Defendant MIGUEL ANGEL RUGERIO, aided and abetted by other persons whose identities are known and unknown to the grand jury, housed "F.G.", an alien, who had come to the United States illegally, at the location of 6168 S. Norcross-Tucker Road, Apartment 1808, in Atlanta, Georgia.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO through FIVE

1. Paragraphs 1 through 8 ("Manner and Means of the Conspiracy") and 1 through 36 ("Overt Acts") of COUNT ONE, are realleged and incorporated by reference herein.

2. On or about the dates identified below as to each count, in the Northern District of Georgia and elsewhere, the defendants identified below as to each count, aided and abetted by one another and other persons whose identities are known and unknown to the

grand jury, did knowingly transport the female alien victim correspondingly identified below, in interstate and foreign commerce, with the intent that the female alien victim listed below engage in prostitution:

COUNT	DEFENDANT (S)	VICTIM	DATES
2	SAUL ROMERO RUGERIO	K.V.	In or about August 2007.
3	MIGUEL ANGEL RUGERIO	I.H.	In or about September 2007.
4	SAUL ROMERO RUGERIO	R.A.	In or about December 2007.
5	MIGUEL ANGLE RUGERIO	F.G.	In or about August 2007.

All in violation of Title 18, United States Code, Sections 2421 and 2.

COUNTS SIX through NINE

1. Paragraphs 1 through 8 ("Manner and Means of the Conspiracy"), and 1 through 36 ("Overt Acts") of COUNT ONE, are realleged and incorporated by reference herein.

2. On or about the dates identified below as to each count, in the Northern District of Georgia and elsewhere, the defendants identified below as to each count, aided and abetted by one another and other persons whose identities are known and unknown to the grand jury, did knowingly, and with reckless disregard of the fact

that the female alien victim correspondingly listed below, came to, entered and remained in the United States in violation of the law, harbor the female alien victim in apartments located in Atlanta and Tucker, Georgia:

COUNT	DEFENDANT (S)	VICTIM	DATES
6	SAUL ROMERO RUGERIO CHRISTINA HERNANDEZ	K.V.	From in or about August 2007 continuing until in or about November 2007.
7	MIGUEL ANGEL RUGERIO CHRISTINA HERNANDEZ	I.H.	From in or about September 2007 continuing until in or about November 2007.
8	SAUL ROMERO RUGERIO CHRISTINA HERNANDEZ	R.A.	From in or about December 2007 continuing until in or about March 2008.
9	MIGUEL ANGEL RUGERIO	F.G.	From in or about March 2008 until in or about August 2008.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii), and Title 18, United States Code, Section 2.

COUNTS TEN through THIRTEEN

1. Paragraphs 1 through 8 ("Manner and Means of the Conspiracy"), and 1 through 36 ("Overt Acts") of COUNT ONE, are realleged and incorporated by reference herein.

2. On or about the dates identified below as to each count, in the Northern District of Georgia and elsewhere, the defendants

identified below as to each count, aided and abetted by one another and other persons whose identities are known and unknown to the grand jury, did directly and indirectly import into the United States the female alien victim correspondingly identified below, for the purpose of prostitution, and did keep, maintain, control, support, employ and harbor the female alien victim correspondingly identified below, for the purpose of prostitution, in pursuance of such illegal importation:

COUNT	DEFENDANT (S)	VICTIM	DATES
10	SAUL ROMERO RUGERIO CHRISTINA HERNANDEZ	K.V.	From in or about August 2007 continuing until in or about November 2007.
11	MIGUEL ANGEL RUGERIO CHRISTINA HERNANDEZ	I.H.	From in or about September 2007 continuing until in or about November 2007.
12	SAUL ROMERO RUGERIO CHRISTINA HERNANDEZ	R.A.	From in or about December 2007 continuing until in or about March 2008.
13	MIGUEL ANGEL RUGERIO	F.G.	From in or about August 2007 until in or about August 2008.

All in violation of Title 8, United States Code, Section 1328
and Title 18, United States Code, Section 2.

A TRUE BILL

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